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September 28, 1983

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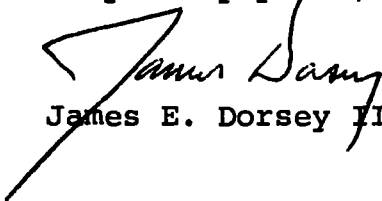
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Minneapolis, Minnesota 55402

Re: U.S.A., et al. v. Reilly Tar &
Chemical Corporation, et al.
Civil No. 4-80-469

Gentlemen:

Enclosed please find the fully executed signature
page of Amended Response to First Request for Admissions With
Interrogatories Served by the State of Minnesota on Reilly Tar
& Chemical Corporation.

Very truly yours,


James E. Dorsey III

/pro

Enclosure

cc: Paul Zerby, Esq.
Robert Leininger, Esq.✓


AMENDED RESPONSE TO ALTERNATIVE INTERROGATORY NO. 3:

Formal and informal discovery in this case is continuing and defendant Reilly Tar & Chemical Corporation ("Reilly") is not at this time apprised of all the relevant facts concerning the actions and intentions of the State. However, for a pretrial response, Reilly directs the State's attention to facts concerning this request for admission and alternative interrogatory which are contained in the following documents: Reilly Tar & Chemical Corporation Exhibits 1 through 113; the Affidavit of Thomas E. Reiersgord dated June 23, 1983; Memorandum of Reilly Tar & Chemical Corporation in Opposition to the State of Minnesota's Motion for Summary Judgment on First Affirmative Defense dated June 24, 1983, pp. 4-24; Reilly Tar & Chemical Corporation's Memorandum of Law in Support of Motions to Dismiss or Substitute and in Opposition to Motions to Amend and Intervene dated June 16, 1978. Reilly observes that the State has had most or all of this information prior to the date of this pleading.

Dated: September 16, 1983

REILLY TAR & CHEMICAL
CORPORATION

By


Robert Polack
Vice President and General
Counsel

Subscribed and sworn to before me
this 22nd day of September, 1983.


Notary Public

VERONICA M. BLEDSOE
MY COMMISSION EXPIRES JANUARY 29, 1986
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